

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LAS MARTAS, INC.

Debtor.

CASE NO. 22-02380 (ESL)

CHAPTER 12

MOTION FOR LEAVE TO REPLY TO “RESPONSE IN OPPOSITION TO MOTION FOR ENTRY OF ORDER TO STAY ANY PENDING MATTER CURRENTLY ON APPEAL UNDER THE DIVESTITURE RULE” AND FOR EXTENSION OF TIME

(Related ECF No. 203)

TO THE HONORABLE COURT:

COMES NOW secured creditor Condado 5, LLC (“Condado”), through the undersigned counsel, and respectfully moves the Court for an order granting it leave to reply to the *Response in Opposition to Motion for Entry of Order to Stay Any Pending Matter Currently on Appeal Under the Divestiture Rule* (ECF No. 203) pursuant to PR L. Civ. R. 7(c), and in support hereof, states:

1. On June 11, 2025, Condado filed a *Motion for Entry of Order to Stay Any Pending Matter Currently on Appeal Under the Divestiture Rule* (ECF No. 197).

2. On June 25, 2025, the Debtor filed a *Response in Opposition to Motion for Entry of Order to Stay Any Pending Matter Currently on Appeal Under the Divestiture Rule* (the “*Opposition*”, ECF No. 203).

3. Pursuant to PR L. Civ. R. 7(c), Condado requests leave to reply to the Debtor’s *Opposition* (ECF No. 203) or otherwise plead within 14 days, through and including Wednesday, July 9, 2025.

4. Condado’s reply will be strictly limited to the averments made by the Debtor in its *Opposition*.

5. This request is made in good faith and for good cause.

WHEREFORE, Condado respectfully prays the Court to grant it leave to reply to the Debtor’s *Opposition* (ECF No. 203) or otherwise plead within 14 days, through and including **Wednesday, July 9, 2025**.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 25th day of June, 2025.

This motion does not require objection notice pursuant to PR LBR 9013-1(c)(3)(B).

Certificate of Service

We hereby certify on this same date, we electronically filed the foregoing with the Clerk of the Court using the Next Gen CM/ECF system, which will send notification of such filing to all Next Gen CM/ECF participants in this case, including the Debtor's counsel, the Chapter 12 Trustee, the U.S. Trustee for Region 21, and all parties that requested notice. Motions and orders processed through CM/ECF are "presumed to be served on the same date of the electronic filing". P.R. Elec. Power Auth. v. Vitol, Inc., 298 F.R.D. 23, 26 (D.P.R.2014).

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